

Supporting Statement for Paperwork Reduction Act Submissions
HUD Environmental Review Online System (HEROS)
OMB# 2506-0202

A. Justification

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

US Department of Housing and Urban Development (HUD) regulations in 24 CFR Part 58, “Environmental Review Procedures for Entities Assuming HUD Environmental Responsibilities,” require Responsible Entities (including States, units of general local government, Indian tribes, territories, and Alaska native villages) receiving HUD assistance or carrying out environmental reviews for recipients to maintain a written environmental review record for all projects receiving HUD funding documenting compliance with the National Environmental Policy Act (NEPA), the regulations of the Council on Environmental Quality, related federal environmental laws, executive orders, and authorities, and Part 58 procedure. Various laws that authorize this procedure are listed in 24 CFR 58.1(b). 24 CFR Part 50, “Protection and Enhancement of Environmental Quality,” implements procedures for HUD to perform environmental reviews for projects where Part 58 review is not permitted by law.

The HUD Environmental Review Online System (HEROS) allows users to complete, store, and submit their environmental review records and documents online. HEROS is currently optional for Responsible Entities and most other non-HUD users, who may continue to use paper-based environmental review formats; however, most HUD staff who prepare environmental reviews are required to use HEROS for all reviews. Regardless of whether they use HEROS or another format, environmental reviews are required by law for all HUD projects.

The form titled “HEROS Access Form” is a new form that will serve as the only means for new users to request and ultimately gain access to HEROS. Respondents will not complete a PDF form, but rather answer the prompts listed on the form on an online website, hosted by DocuSign.

2. Indicate how, by whom and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

The respondents are HUD recipients who are required to complete environmental reviews as well as sub-recipients, applicants, and third-party providers who submit information to be used in the completion of environmental review records. The purpose of the information collection is to document that HUD-assisted projects and activities comply with all applicable environmental authorities. Beyond the primary purpose of documenting compliance with federal environmental law, HUD uses data collected in HEROS to track environmental compliance and risk (e.g. projects located in floodplains or contaminated sites).

The HEROS Access Form will be utilized by new HEROS users wishing to gain access to HEROS, as well as existing users who will begin preparing or certifying HUD environmental reviews for a new organization. No previously uncollected information will be collected by this form; it merely replaces a previous form hosted by a different website/system.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.

Recipients and other users are able to complete, store, and submit their environmental review records electronically using HEROS. HEROS was designed to reduce the burden on recipients by eliminating repetitive and unnecessary requirements, tailoring formats to the specifics of each environmental review record, and autofill information where feasible to avoid repetitive or unnecessary data entry. The system also allows users to submit their approval document, the HUD-7015.15, electronically through HEROS.

The HEROS Access Form uses an online website from the company DocuSign that allows respondents to easily provide the information required to gain HEROS access. It replaces a previous form that utilized the Google Docs system. This new means of collection, through the DocuSign system, allows for better information security/privacy protection. Additionally, it continues to automate the new HEROS user request process, preventing HUD staff from receiving new user requests via email.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

There is no similar information already available. Environmental reviews must be completed for each project individually and the information and analysis are project-specific.

5. If the collection of information impacts small businesses or other small entities describe any methods used to minimize burden.

This collection of information does not impact small businesses or other small entities.

6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

If this collection is not conducted or is conducted less frequently, then the flow of HUD funding and other assistance would be significantly slowed. Without HEROS, Environmental review preparers would have to conduct traditional, "paper" environmental reviews, which often take longer to complete due to the administrative time savings that HEROS provides.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

- requiring respondents to report information to the agency more than quarterly;

There are no special circumstances that would cause information to be collected in this manner.

- requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;

There are no special circumstances that would cause information to be collected in this manner.

- requiring respondents to submit more than an original and two copies of any document;

There are no special circumstances that would cause information to be collected in this manner.

- requiring respondents to retain records other than health, medical, government contract, grant-in-aid, or tax records for more than three years;

There are no special circumstances that would cause information to be collected in this manner.

- in connection with a statistical survey, that is not designed to produce valid and reliable results than can be generalized to the universe of study;

There are no special circumstances that would cause information to be collected in this manner.

- requiring the use of a statistical data classification that has not been reviewed and approved by OMB;

There are no special circumstances that would cause information to be collected in this manner.

- that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or

There are no special circumstances that would cause information to be collected in this manner.

- requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

There are no special circumstances that would cause information to be collected in this manner.

8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

- Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping disclosure, or reporting format (if any) and the data elements to be recorded, disclosed, or reported.
- Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years -- even if the collection of information activity is the same as in prior periods. There may be circumstances that preclude consultation in a specific situation. These circumstances should be explained.

HUD solicited public comment on this information collection through publication of a 60-Day Notice of Proposed Information Collection in the Federal Register, per 5 CFR 1320.8(d). This notice was published in the Federal Register on February 28, 2024, at volume 89, page 14676. There were **no** public comments received.

Although HUD does not additionally formally consult with or solicit public views on this information collection, HUD environmental staff regularly provide technical assistance and support to environmental review preparers on using HEROS, and these opportunities allow for environmental review preparers to provide specific comments/feedback on HEROS and how it collects information.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

This is not applicable, because HUD does not provide any payment or gifts as remuneration for this information collection. The funds awarded are on the basis of a formula-allocation or national competition, but fund recipients must certify compliance with statutory and regulatory requirements and receive HUD approval (or State approval as appropriate) for the release of funds for proposed projects and activities.

10. Describe any assurance of confidentiality provided to respondents and the basis for assurance in statute, regulation or agency policy. If the collection requires a system of records notice (SORN) or privacy impact assessment (PIA), those should be cited and described here.

Environmental reviews are public documents that must be made available upon request to any member of the public, and therefore HEROS provides no assurance of confidentiality under HUD environmental review procedures.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

HEROS does not involve questions of a sensitive nature as described above.

12. Provide estimates of the hour burden of the collection of information. The statement should:
- Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices;
 - If this request covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in chart below; and
 - Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 13.

HEROS

Information Collection	Number of Respondents	Frequency of Response	Responses Per Annum	Burden Hour Per Response	Annual Burden Hours	Hourly Cost Per Response ¹	Annual Cost
Exempt/ CENST reviews	500	34.75	17375	0.75	13,031	\$39.63	\$516428.43
Reviews that convert to exempt	500	12.35	6175	2	12,350	\$39.63	\$489430.50
CEST/EA reviews	250	11.34	2,835	4	11,340	\$39.63	\$449404.20
Total	500	58.44	26,385	varies	36,721	\$39.63	\$1,455,263.1

HEROS Access Form

Information Collection	Number of Respondents	Frequency of Response	Responses Per Annum	Burden Hour Per Response	Annual Burden Hours	Hourly Cost Per Response	Annual Cost
HEROS Access Form HUD 4755	2,870	1.05	3,013	.10	301.3	\$39.63	\$11,940.52
Total	2,870	1.05	3,013	.10	301.3	\$39.63	\$11,940.52

¹ Caveat to the monetary costs for HEROS: HUD grants cover all eligible costs, including staff work for grant recipients, so for HUD grants (as opposed to other forms of HUD assistance, such as FHA-backed multifamily mortgages) the monetary costs are typically \$0 for all environmental review types.

Average hours per response for HEROS varies substantially depending on the level of review. Reviews that are exempt or Categorically Excluded Not Subject To the related laws and authorities (CENST) take roughly 45 minutes to complete. Reviews that are Categorically Excluded Subject To the related laws (CEST) or require an Environmental Assessment (EA) take 4 hours to complete on average. Some CEST reviews “convert to exempt,” and require roughly 2 hours to complete.

HUD grants cover all eligible costs including staff work. HUD grants do *not*, however, cover the cost for completing the HEROS Access Form. Hourly cost per response based on hourly mean wage of urban planners working for local government (Bureau of Labor Statistics, <https://www.bls.gov/oes/current/oes193051.htm>).

For HEROS, Number of respondents and responses per annum based on the number of reviews completed using HEROS in Fiscal Year 2020 and Fiscal Year, 2024 respectively, which are the latest years data were collected. HUD has data on the number of active HEROS users and the number of completed environmental reviews, which it used to calculate the average responses per user. While most users will complete one or more exempt or CENST reviews, only about half of users would be expected to complete CEST- or EA-level reviews.

13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected on the burden worksheet shown in Items 12 and 14).
 - The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life); and (b) a total operation and maintenance purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s) and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities;
 - If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10) utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.
 - Generally, estimates should not include purchases of equipment or services, or portions thereof made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.

This is not applicable to HEROS for these reasons: (1) generally the above listed items do not apply to this information collection; and (2) maintaining a copy of the environmental review record as part of the recipient’s environmental review is a nominal part of project costs which are eligible for reimbursement under the HUD grant.

HEROS Access Form

For the HEROS Access Form, costs associated with completing the form are born by the respondents. The cost burden to respondents is displayed in the table below.

Information Collection	Number of Respondents	Frequency of Response	Responses Per Annum	Burden Hour Per Response	Annual Burden Hours	Hourly Cost Per Response	Annual Cost
HEROS Access Form HUD 4755	2,870	1.05	3,013	.10	301.3	\$39.63	\$11,940.52
Total	2,870	1.05	3,013	.10	301.3	\$39.63	\$11,940.52

14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.

HEROS- Information Collection

Information Collection	Number of Respondents	Frequency of Response	Responses Per Annum	Burden Hour Per Response	Annual Burden Hours	Hourly Cost Per Response	Annual Cost
Exempt/ CENST reviews	500	34.75	17,375	0.75	13,031	\$39.63	\$516,428.16
Reviews that convert to exempt	500	12.35	6,175	2	12,350	\$39.63	\$489,430.50
CEST/EA reviews	250	11.34	2,835	4	11,340	\$39.63	\$449,404.20
Total	500	varies	26,385	varies	36,662	\$39.63	\$1,455,263.10

Average hours per response varies substantially depending on the level of review. Reviews that are exempt or Categorically Excluded Not Subject To the related laws and authorities (CENST) take roughly 45 minutes to complete. Reviews that are Categorically Excluded Subject To the related laws (CEST) or require an Environmental Assessment (EA) take an average of 4 hours to complete. Some CEST reviews “convert to exempt,” and require roughly 2 hours to complete.

HUD grants cover all eligible costs including staff work. Hourly cost per response based on hourly mean wage of urban planners working for local government (Bureau of Labor Statistics, <https://www.bls.gov/oes/current/oes193051.htm>).

HEROS Access Form

For the HEROS Access Form, the only costs to the federal government are staff costs. This cost is equivalent to 25 percent of the annual salary of a GS-13 employee in the Washington-Baltimore-Arlington locality area. This cost equals roughly \$29,490.50.

Operation and Maintenance

The annual operations and maintenance costs for HEROS are estimated at **\$553, 500**. This was derived by taking 25 percent of the total annual corrective maintenance and steady state operations support and program management contract costs for the HUD Office of Community Planning and Development’s Integrated Disbursement and Information System (IDIS), of which HEROS is a part of. HEROS represents approximately 25% of the IDIS contract.

HEROS Information Collection	HEROS Access Form	Operation and Maintenance	Total
\$1,452,915.06	\$29,490.50	\$553,500	0

15. Explain the reasons for any program changes or adjustments reported in Items 12 and 14 of the Supporting Statement.

This is a revision of a previously approved collection. HEROS was first put into production in early 2014, and it has been optional for most users since then. The values in Items 13 and 14 are based on data collected in HEROS during Fiscal Years 2020 (number of users) and 2024 (number of reviews), which reflects an increased number of reviews compared to the last renewal of this clearance in 2020. The increase mostly reflects the increased popularity of HEROS as more users elect to use HEROS instead of paper formats to prepare their environmental reviews.

16. For collection of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

The results will not be published.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

The expiration date will be displayed.

18. Explain each exception to the certification statement identified in item 19.

No exceptions were identified.

B. Collections of Information Employing Statistical Methods